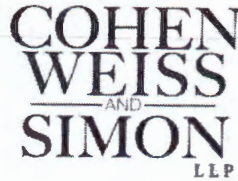


MEMO ENDORSED



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April 12, 2021

Via Electronic Case Filing

Honorable Kenneth M. Karas  
USDC Southern District of New York  
The Hon. Charles L. Brieant Jr.  
Federal Building and Courthouse  
300 Quarropas Street  
White Plains, New York 10601-4150

Re: *Teamsters Local 456 Funds v. Lumia*  
*Leasing, et al., Case No. 7:20-cv-02420 (KMK)*

Dear Judge Karas:

We represent plaintiffs in the above referenced action.

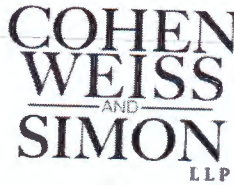
We write, after consult with counsel for defendants, because of the bankruptcy filing referenced in defense counsel's April 11, 2021 Notice of Bankruptcy. Docket No. 45.

After consult between the parties, given that all three defendants/counter-plaintiffs filed for bankruptcy protection under Chapter 7 of the Bankruptcy Code, the parties agree that a stay on all claims and defenses in this case should be in place.

Accordingly, the parties request that the Court deem the entire case stayed, pending resolution of the bankruptcy matter.

To that extent, subject to the Court's consent, the parties have agreed to stay depositions and document production scheduled to take place over the coming couple of weeks, amongst other case related matters anticipated to take place over the coming couple of months.

Should the Court desire, we are prepared to file status reports every forty-five (45) days to keep the Court informed as to the status of the bankruptcy proceeding. Of course, we will alert the Court of any major bankruptcy developments as soon as possible after they occur.



Hon. Kenneth M. Karas  
USDC Southern District of New York  
April 12, 2021  
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We thank the Court for its consideration of this matter.

Respectfully submitted,

*Michael S. Adler*

Michael S. Adler

cc: Karin Arrospide, Esq. (via ECF)

Granted. The Parties are to provide written updates on  
the case every 45 days.

So Ordered.

4/12/21